



MEMO ENDORSED

GEORGIA M. PESTANA

Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

Howard S. Krebs
Special Assistant Corporation Counsel
Cell: (516) 901-5170

August 9, 2021

VIA ECF

Hon. Kathleen H. Parker
Daniel Patrick Moynihan Courthouse
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *T.C. et al. v. N.Y.C. Dept. of Educ.* 21-cv-4325(JMF)(KHP)

Dear Judge Parker:

I am Special Assistant Corporation Counsel in the office of Corporation Counsel Georgia Pestana, attorney for Defendant in the above-referenced action. Plaintiffs' counsel has now provided my office with all billing records and information required for me to review their claim and to seek authority from the Comptroller's Office to make a settlement offer to the Plaintiffs. My review of the billing records and settlement recommendation will be submitted to the Comptroller's office shortly.

I have spoken with plaintiff's counsel, Steven Alizio, regarding the upcoming initial conference presently scheduled to be held telephonically on Wednesday, August 11, 2021 at 10:00 a.m. (see ECF No. 17). The parties jointly and respectfully request that this conference be adjourned for a sixty-day time period to October 11, 2021 (or a date thereafter convenient for the Court) to allow the parties to independently achieve a settlement of this matter without the need to place any burden on the Court's schedule and resources. This is the first request for an adjournment of the Initial Case Management Conference. We respectfully make this request, and apologize for the late timing of the request, with the belief that this case can be settled, as is the case with the vast majority of these IDEA fee shifting cases.

Accordingly, the parties respectfully request that the initial conference for this matter be adjourned to October 11, 2021 or a date thereafter convenient for the Court.

APPLICATION GRANTED: The Initial Case Management Conference in this matter scheduled for Wednesday, August 11, 2021 at 10:00 a.m. is hereby rescheduled to Tuesday, October 19, 2021, at 10:45 a.m. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code 4858267.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

08/10/2021

Thank you for considering this submission and request.

Respectfully submitted,

/s/

Howard S. Krebs

Special Assistant Corporation Counsel

cc: Steven Alizio, Esq. (via ECF)